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TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION
EPA CONTRACT 68-01-7367

Mr. Duane Heaton
Deputy Project Officer
Emergency Support Section, 5 HS-12
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

October 24, 1990

TAT-05-G2-02222

Re: Chicago Industrial Waste Haulers, Alsip, Illinois
TDD# 5-9010-02

Dear Mr. Heaton:

The U.S. Environmental Protection Agency (U.S. EPA) tasked the Technical Assistance Team (TAT) to monitor the Potentially Responsible Party (PRP) cleanup at the Chicago Industrial Waste Haulers (CIWH) site in Alsip, Cook County, Illinois (Figure 1). The task entailed: reviewing the work, sampling and safety plans developed by Dunn Geoscience Corporation; monitoring site activities; documenting all actions at the site; and providing technical assistance as needed.

The CIWH site, located at 4206 Shirley Lane, is an abandoned waste oil storage facility (Figure 1). The site is bordered to the north by a vacant lot, to the west by the Baltimore and Ohio Chicago Terminal Railroad tracks, to the south by an operating facility, and to the east by Shirley Lane and Marcus Trucking Inc. The site is located in a heavily industrialized area, but a playground (Prairie View Park) and residential area lie approximately 200 feet north of the site. A small intermittent stream, Stony Creek, flows along the northern boundary of the site and separates the site from the nearby residential area.

PRP removal activities focused on a six-acre lot which is completely enclosed by a seven-foot high chain link fence. The site also contains a parcel of land northeast of the fenced area. Prior to the PRP removal, the site consisted of one building situated along the east fenceline, and several above-ground tanks scattered throughout the property. The tanks ranged in capacity from 5,000 to 15,000 gallons. Five of the tanks were surrounded by containment diking, and two tanks were mounted on truck trailers. Sections of piping, sheets of steel and parts of dismantled tanks were scattered throughout the site and were stored in two rolloff boxes (Figure 2).

Under the name of Chicago Tank Cleaners, Inc., Anthony Prunsky began operations at the CIWH facility in 1956. On September 30,

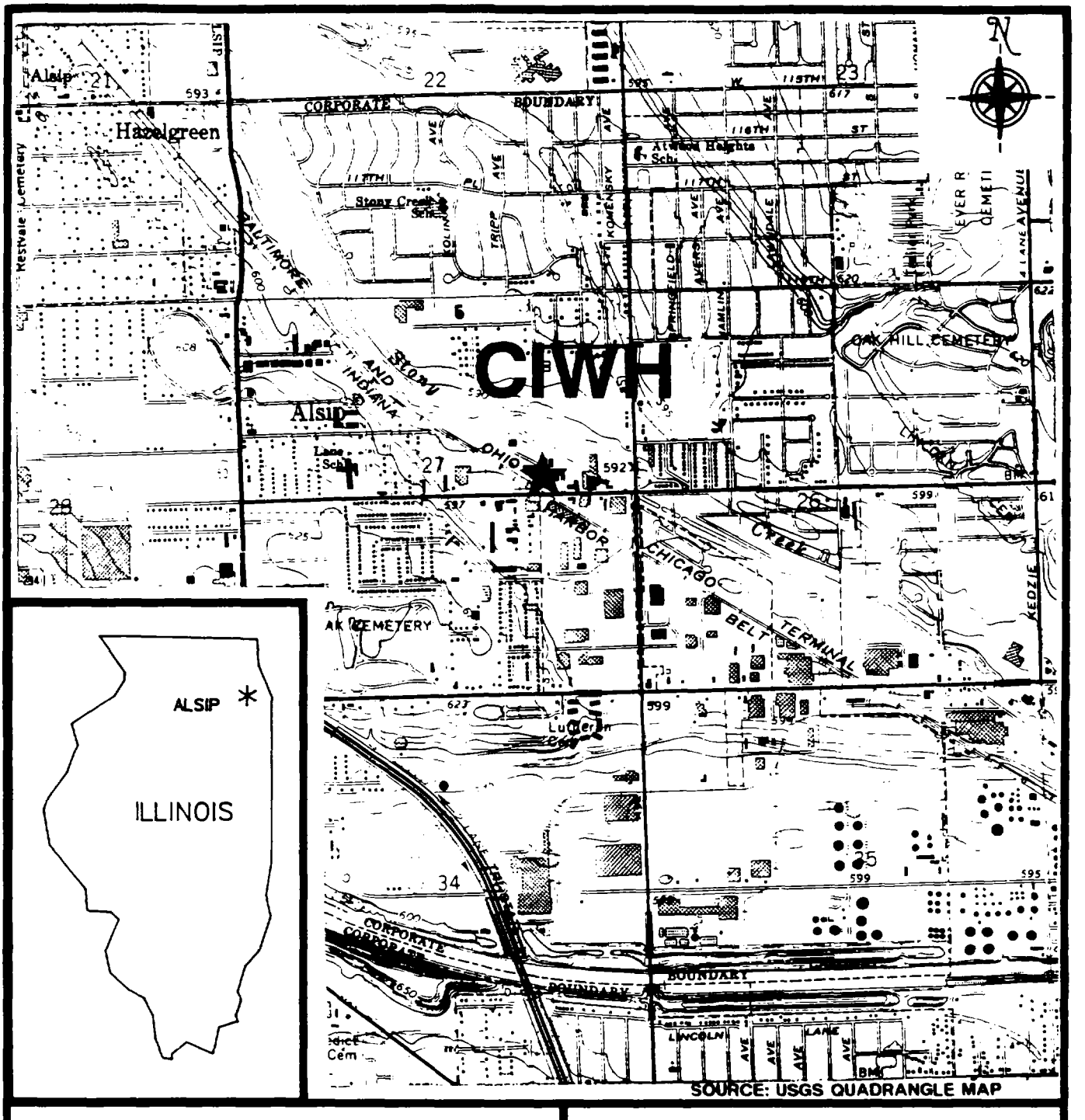

FIGURE 1

SITE LOCATION MAP

CHICAGO INDUSTRIAL WASTE HAULERS SITE

ALSIP, ILLINOIS

SCALE:1 INCH = 2000 FEET

WESTON MANAGERS DESIGNERS/CONSULTANTS — MAJOR PROGRAMS DIVISION

REGION V TECHNICAL ASSISTANCE TEAM

DRAWN BY P. Fauble	DATE 8-10-89	PCS # 3002
APPROVED BY R. Mehl	DATE 8-10-89	TDD # 5-9010-02

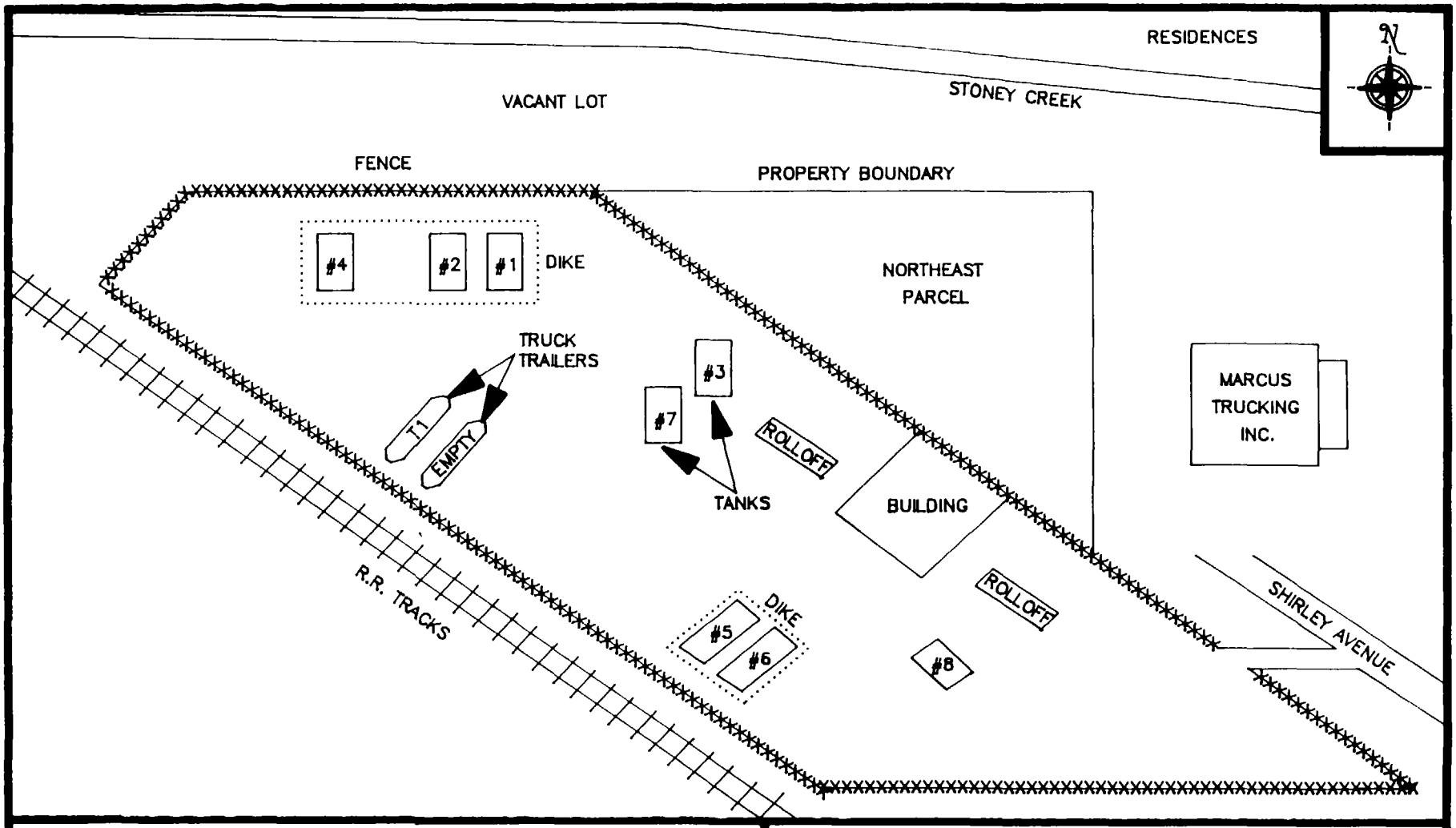

FIGURE 2

SITE MAP

CHICAGO INDUSTRIAL WASTE HAULERS

ALSIP, ILLINOIS

NOT TO SCALE

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REGION V TECHNICAL ASSISTANCE TEAM

DRAWN BY M. BALAZS	DATE 10-24-90	PCS # 3002
APPROVED BY A. POTJE	DATE 10-24-90	TDD # 5-9010-02

1984, two children were seriously injured when fumes from one of the tanks at the facility ignited. After the incident, the Illinois Environmental Protection Agency (IEPA) was notified by the Village of Alsip, and performed a site investigation at the site on October 1, 1984. Tank samples collected by the IEPA displayed Resource Conservation and Recovery Act (RCRA) ignitability characteristics.

In November 1985, the corporation was involuntarily dissolved by the Illinois Secretary of State and the business changed its name to CIWH. CIWH cleaned and repaired tanks, brokered waste oil from gas stations, factories, and oil spills, and transported hazardous wastes. The company discontinued use of the site after its permit to transport hazardous wastes was not renewed in 1986. Tanks filled with oil and unknown waste liquids were abandoned on the site. Kevin Prunsky, son of Anthony Prunsky, is presently the owner of the CIWH facility as well as the owner and president of Pollution Control Industries of America (PCIA). PCIA, which has a facility in East Chicago, Indiana, operates as a broker and temporary storage facility for waste oil and solvents.

On March 10, 1989, the TAT conducted a Spill Prevention Control and Countermeasure (SPCC) inspection at the CIWH site. Violations of SPCC regulations were observed including the lack of secondary containment around some above ground storage tanks. Air monitoring conducted with an organic vapor analyzer (OVA) revealed readings as high as 65 units above background levels near one of the tanks.

On March 17, 1989, the TAT conducted a site assessment at the CIWH site. The site assessment report (TDD# 5-8903-12) documents the presence of 24 above-ground storage tanks, some labeled "PCBs" and "Flammable", an abandoned building, and numerous unlabeled drums. At the time of the inspection, a PCIA crew was observed cutting tanks, removing material and containerizing waste into drums. Several tanks, present during the SPCC inspection on March 10, 1989, had been removed from the site.

Nine samples from various tanks were collected and analyzed for F-listed solvents, polychlorinated biphenyls (PCBs), and Extraction Procedure (EP) toxicity metals. The analytical results indicated that the sampled tanks displayed RCRA hazardous characteristics. Three of the tanks were found to have flashpoints below 140 degrees Fahrenheit (°F) and six tanks contained PCB levels in excess of 50 parts per million (ppm). PCB concentrations in excess of 50 ppm are regulated by the Toxic Substance Control Act (TSCA) and require specific management and disposal practices. In addition to PCBs, specific compounds detected in the tanks included ethyl benzene, toluene, xylenes and methylene chloride. Besides tank samples,

five of eleven soil sampling locations indicated PCB levels ranging from 2.3 to 50 ppm.

Based on the U.S. EPA site assessment and analytical results, conditions at the CIWH site posed a direct threat to human health and the environment. The site conditions warranted a removal action as outlined in the then-effective Section 300.65(b)(2) of the National Contingency Plan. Specifically, the following conditions existed at the CIWH site:

- Actual or potential exposure to hazardous substances by nearby populations or animals;
- Hazardous substances or pollutants or contaminants in drums, barrels, tanks that may pose a threat of release; and,
- Threat of fire or explosion.

The U.S. EPA commenced a removal action at the CIWH site on March 25, 1989 (TDD# 5-8905-21). The removal action, implemented to eliminate the immediate threats posed to public health and the environment, consisted of (Phase I) pumping and disposing of all liquid hazardous waste contained in the remaining tanks. The action was completed on June 12, 1989.

On April 19, 1989, the U.S. EPA, under Section 106 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, issued a Unilateral Administrative Order (AO) to the owners of the CIWH facility. The CIWH president was identified as Mr. K. Prunsky, current owner of PCIA. The responsibility for the next phase (Phase II) of the cleanup belonged to the PRP, CIWH.

Phase II of the removal involved the decommissioning and disposal of all above ground tanks as well as the eventual treatment of all contaminated on-site soils. As outlined in the AO the PRP was required to perform the following actions:

1. Submit a site health and safety, and scope of work plan;
2. Retain a qualified contractor to complete the requirements of the AO;
3. Restrict access to potentially contaminated areas of the facility;
4. Conduct a radiological survey;
5. Sample all tanks and containers at the facility for disposal parameters;
6. Conduct a geophysical and soil gas survey around the site in order to locate all buried drums and tanks;
7. Perform an extent of soil contamination study;

8. Submit a soil removal plan if contamination is discovered; and,
9. Conduct a study to determine if ground water has been contaminated.

The PRP submitted a Draft Work Plan for TAT review on several occasions during 1989 and 1990. The Work Plan was periodically revised to incorporate new or altered work activities.

During the period July 19, 1989 to September 11, 1989, PCIA subcontracted Industrial Cleanup for Environmental Protection (ICEP) to clean eight on-site tanks. To ensure no explosive gases were present inside the tanks, ICEP obtained Lower Explosive Limit (LEL) and oxygen (O_2) readings with a Combustible Gas Indicator before cutting operations were initiated. After air monitoring was conducted, an approximate three-foot opening was cut in the side of each tank. Any excess sludge remaining in the tanks was drummed. These drums were staged inside the on-site building. Tank walls were then triple rinsed with diesel fuel, followed by a penatone cleaning of all inside walls.

U.S. EPA On-Scene Coordinator (OSC) Len Zintak determined that the eight tanks were clean and could be dismantled after they were triple rinsed and washed with penatone. During the period November 17, 1989 through December 29, 1989, PCIA cut up the eight tanks with an acetylene torch. The cut up tanks were disposed of at Industrial Scrap Iron (ISI) located in East Chicago, Indiana.

On November 1, 1989, PCIA collected samples from the two rolloffs located on the northwest and southeast sides of the on-site building. Analytical results from the rolloff which contained plastic pipes and debris, located on the southern side of the building indicated an Aroclor 1260 PCB level of 52 parts per million (ppm). The rolloff which contained metal debris, located on the northern side of the building indicated 11 ppm of Aroclor 1260.

Due to the elevated level (greater than 50 ppm) of PCBs, the plastic pipes and debris were removed from the rolloff and staged on visqueen. The rolloff, as well as scrap metal collected from the site, was decontaminated with diesel fuel. Between December 14 and December 29, 1989, this rolloff, and additional rolloffs, were loaded with decontaminated scrap metal, and transported to ISI. The metal debris in the rolloff located on the northern side of the building was decontaminated and transported to ISI on December 13, 1989.

In July 1990, a radiological survey was conducted by Woodward & Clyde representatives. No readings above background were obtained. In order to determine the extent of PCB and volatile organic compound (VOC) contamination in soils, K & S Surveying personnel set up a sampling grid (Figure 3) and Woodward & Clyde representatives collected soil samples during July-August 1990. Samples from zero to six inches and seven to twelve inches were analyzed for PCBs. Depth samples of each boring, collected at two-foot intervals up to twelve feet, were analyzed for VOCs. These samples were monitored for soil gases via a headspace analysis with an HNU photoionization detector (HNU). At each boring, the depth sample that registered the highest HNU reading was selected for VOC analysis as the worst-case representative of that sample point. The HNU did not detect VOC levels greater than five ppm (the minimum level before a sample is submitted to a laboratory) in any of the depth samples collected from outside the fenced area.

Analytical results from the surface samples indicated low levels of PCBs (five to ten ppm) at two locations. VOC analytical results were not available from the PRP as of October 15, 1990. All samples were analyzed by Chem-Bio Corporation (CBC) Environmental Services in Oak Creek, Wisconsin.

In order to search for buried drums, Environmental Cleanup Contractor Service, a PRP contractor, excavated seven trenches in August 1990. The trenches were excavated at predetermined locations with a backhoe and were between 60 and 80 feet long, approximately 30 inches wide, and approximately 8 feet deep. Miscellaneous drum parts were located, but no drums with contents were uncovered. In some of the trenches within the fenced portion of property, coagulated grease from sewer line grease traps and visible oil were observed.

Woodward & Clyde conducted headspace analysis on the soil after every 15-foot length of trench excavation by collecting soil in a glass jar and monitoring the headspace in the jar with an HNU. Samples of soil with elevated levels (greater than five units) of total organic vapors were submitted to CBC Environmental Services for analysis.

After the trenching was completed, drums containing non-hazardous sludge removed from cut tanks (tank numbers 5 and 6) were taken to the PCIA facility for fuel blending in middle to late August 1990. According to Chuck Smith, Project Manager for PCIA, sampling conducted previously revealed that the sludge was non-hazardous [petroleum-based sludge with a high British Thermal Unit (BTU) value].

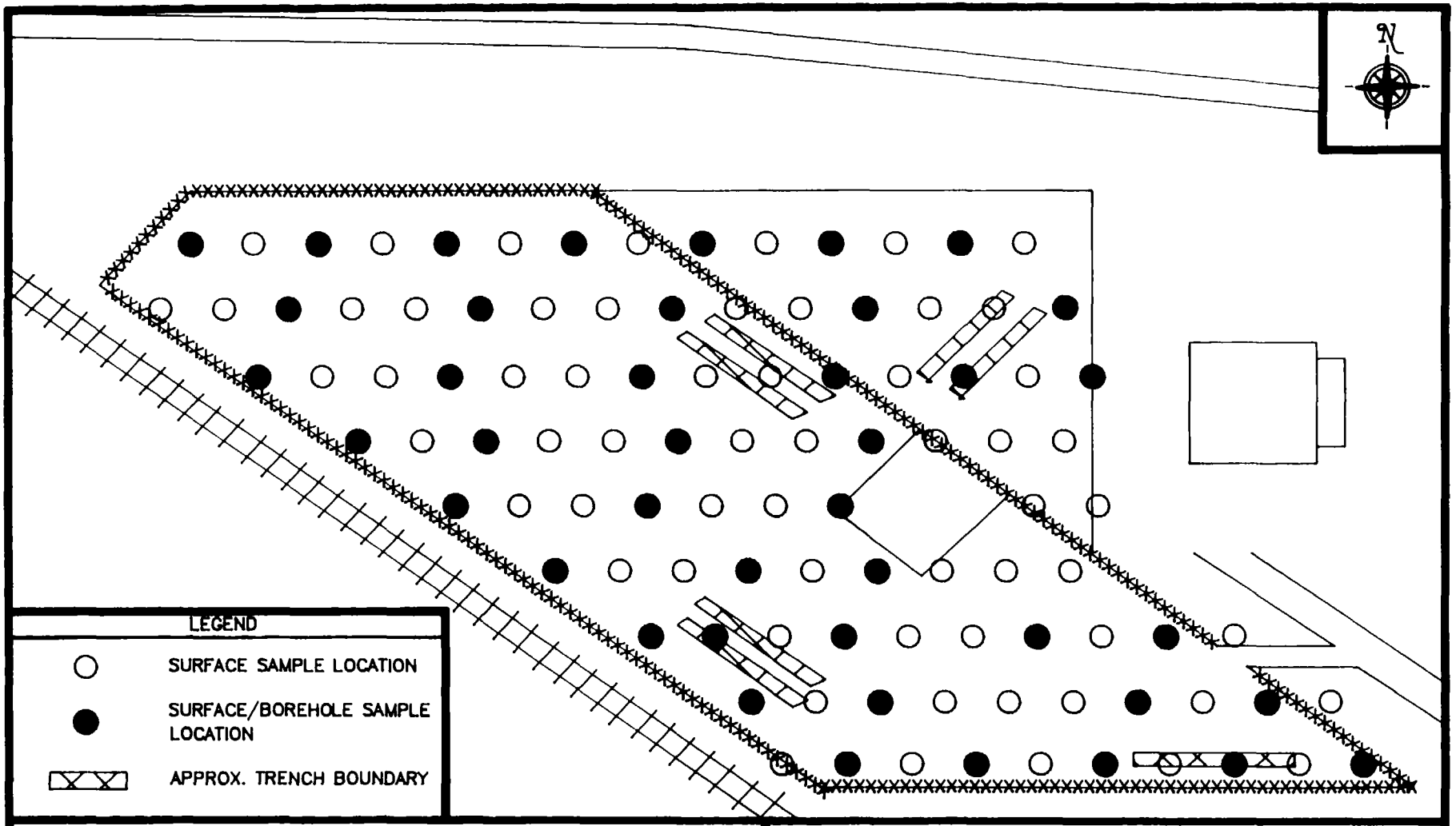

FIGURE 3

SAMPLE/TRENCH LOCATION MAP

CHICAGO INDUSTRIAL WASTE HAULERS

ALSIP, ILLINOIS

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Currently, PCIA is in the process of arranging disposal for the remaining drums and tanks of waste material still on site. Eventually, a soil removal plan and ground water study may be conducted.

Should you have any questions or require any additional information, please feel free to contact us.

Very truly yours,

ROY F. WESTON, INC

Nikhil Kumaranayagam
Environmental Scientist

William R. Doyle
Technical Assistance Team
Leader, Region V

NK:ap
cc:Len Zintak, OSC